



**Resolute Forest Products – Catawba Mill**  
5300 Cureton Ferry Road  
Post Office Box 7  
Catawba, SC 29704-0007

FED EX NO. 7754 1029 4502

January 13, 2016

Mr. Heinz Kaiser, Manager  
Air Toxics Section  
SCDHEC Bureau of Air Quality  
2600 Bull Street  
Columbia SC 29201-1708

Re: Resolute Forest Products – Catawba Operations  
Permit No. TV-2440-0005

Dear Mr. Kaiser:

The purpose of this submittal is to meet the semi-annual reporting requirements applicable to the Catawba Mill associated with the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63, Subpart S). This submittal meets the requirements for both the Periodic Startup, Shutdown, and Malfunction (SSM) Report and the Excess Emissions and Continuous Monitoring System (CMS) Performance Report pursuant to Sections 63.10(d)(5)(i) and 63.10(e)(3), respectively.

Excess emissions and CMS downtime for the reporting period were less than 1% and 5% respectively for all systems. For SSM purposes when an emission has occurred, specific information about the type and duration is reported on the enclosed log(s).

The total of steam stripper downtime plus time of excess emissions during the reporting period did not exceed ten percent as allowed in Section 63.446(g). Actions taken during SSM events, including corrective actions, were consistent with the procedures specified in the SSM Plan for this facility.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Dale Herendeen at (803) 981-8009.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Scott Palmer', is written over a horizontal line.

Scott Palmer  
General Manager

SP/dlh  
File 231.14

Enclosures

cc: EPA Region 4  
Zach Pensa, Midlands EQC Lancaster

## SUMMARY REPORT

### GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Chlorine  
Time Period: 3-Hour Average  
Reporting Period: July 1, 2015 through December 31, 2015  
Process Unit Description: Bleach Plant Scrubber System  
  
Company: Resolute Forest Products – Catawba Mill  
  
Emission Limits: Scrubber Outlet Conc. <10 ppmv Cl<sub>2</sub> (40 CFR 63.445 (c)(2))  
  
Operating Parameters: Scrubber liquid influent (recirculation) flow > 50 gpm  
Scrubber effluent pH > 9.7  
Scrubber fan operational status - ON  
  
Monitor Manufacturer(s) and Model Number(s): Liquid flow / Foxboro IMT24 PDAB810MAB  
pH / TBI TBX557-J1E11f20JB  
  
Last CMS Certification or Audit Date: Flow Meter Audit (Calibration): March 13, 2015  
pH (Calibration): May 1, 2015  
  
Total Source Operating Time in Reporting Period: 4,259 hours

### EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	13.0 Hours
Other Unknown Cause	0 Hour
Total Number of Incidents	1
Excess Emissions / Process Operating Time	0.31 %

### CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Causes	0 Hour
Other Unknown Causes	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	0.00 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Scott Palmer General Manager

Signature:  7/15/16

## SUMMARY REPORT

### GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol  
Time Period: 15-day rolling average  
Reporting Period: July 1, 2015 through December 31, 2015  
Process Unit Description: Condensate Collection and Treatment System  
Company: Resolute Forest Products – Catawba Mill  
Emission Limits: Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3))  
Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))  
Operating Parameters: Condensate Feed Rate, Condensate Feed Temperature, Steam Flow  
Effective Steam Ratio (condensate feed rate / (steam flow to column  
less steam for condensate preheat) > 16 = 92%  
Monitor Manufacturer(s) and Model Number(s): Condensate Flow – Rosemount /3051CD2A22A1JB4L4M6  
Steam Flow - Rosemount /3051CD2A22A1JB4L4M6  
Condensate Temperature – Rosemount/3144D5E5B4T1M5  
Last CMS Certification or Audit Date: N/A (all critical instruments are calibrated annually)  
Total Source Operating Time in Reporting Period: 4,289 hours

#### EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	0 Hour
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Excess Emissions / Process Operating Time	0.00 %

#### CMS PERFORMANCE SUMMARY

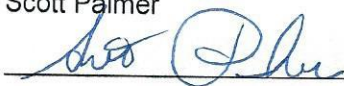
Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	0.0 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Scott Palmer General Manager

Signature:



1/15/16



## SUMMARY REPORT

### GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Time Period: Hours

Reporting Period: July 1, 2015 through December 31, 2015

Process Unit Description: HVLC System – Combination Boilers

Company: Resolute Forest Products – Catawba Mill

Emission Limits: Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 4% excluding SSM plan excess emissions.

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: 4,289 hours

### EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0.0 Hour
B. Malfunctions	
Process/Instrument System	6.5 Hours
Control/Operating/Collection	0.9 Hour
Other Known Cause	0.2 Hour
Other Unknown Cause	0.0 Hour
Total Number of Incidents	7
Excess Emissions / Process Operating Time	0.18 %
Total Duration of Excess Emissions excluding SSM	
Plan Excess Emissions/ Process Operating Time	0.01 %

*Note: Specific incidents are shown on the attached log for SSM purposes*

### CMS PERFORMANCE SUMMARY

A CMS is not required when HVLC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Scott Palmer General Manager

Signature:  1/15/16

## SUMMARY REPORT

### GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Time Period: Hours

Reporting Period: July 1, 2015 through December 31, 2015

Process Unit Description: LVHC System – Combination Boilers

Company: Resolute Forest Products – Catawba Mill

Emission Limits: Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 1% excluding SSM plan excess emissions.

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: 4,289 hours

### EMISSION DATA SUMMARY

	Reason for Excess Emissions	Duration
<i>Note: Specific incidents are shown on the attached log for SSM purposes</i>	A. Startup/Shutdown	0.0 Hour
	B. Malfunctions	
	Process/Instrument System	2.2 Hours
	Control/Operating/Collection	1.5 Hours
	Other Known Cause	0.5 Hour
	Other Unknown Cause	0.0 Hour
	Total Number of Incidents	13
	Excess Emissions / Process Operating Time	0.10 %
	Total Duration of Excess Emissions excluding SSM	
	Plan Excess Emissions/ Process Operating Time	0.01 %

### CMS PERFORMANCE SUMMARY

A CMS is not required when LVHC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Scott Palmer General Manager

Signature:  1/15/16



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TV

## CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Kraft Process - Bleach Plant Scrubber

Permit Conditions: 5.C.03.1 & MACT.3(A)

Report Period 7/1/15 to 12/31/15

This report is for variations outside of surrogate monitoring parameters or permit condition exceptions.

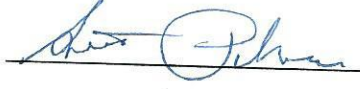
Incident No.	Date	Start Time (am or pm)	Parameter	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
			pH, Flow, delta P			
					There were no excursion events or downtime during the month of July 2015.	
					There were no excursion events or downtime during the month of August 2015.	
					There were no excursion events or downtime during the month of September 2015.	
1	10/23/2015	3:00 PM	pH	780	pH control was previously placed in manual mode (occurred intermittently over a few days)	Placed pH control back into cascade mode
					There were no excursion events or downtime during the month of November 2015.	
					There were no excursion events or downtime during the month of December 2015.	

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Scott Palmer

General Manager

Signature:

 1/15/16





resolute  
Forest Products

ID 9801

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## CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Condensate Steam Stripper

Report Period 7/1/15 to 12/31/15

Permit Condition MACT.2

This report is for variations below minimum 15-day average collection (11.1 #/ODTP) and treatment (10.2 #/ODTP).


Incident No.	Date	Start Time (am or pm)	Parameter	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
			Flow and Steam			
					There were no exceedances of 15-day mass averages during the month of July 2015.	
					There were no exceedances of 15-day mass averages during the month of August 2015.	
					There were no exceedances of 15-day mass averages during the month of September 2015.	
					There were no exceedances of 15-day mass averages during the month of October 2015.	
					There were no exceedances of 15-day mass averages during the month of November 2015.	
					There were no exceedances of 15-day mass averages during the month of December 2015.	

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Scott Palmer

General Manager

Signature:

 1/15/16



ID 2605, ID 3705

Resolute Forest Products – Catawba Mill  
5300 Curleton Ferry Road  
Post Office Box 7  
Catawba, SC 29704-0007

SIP, NSPS

## CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

## High Volume Low Concentration Gas System

Report Period 7/1/15 to 12/31/15

Permit Conditions 5.C.08.1(B), 5.C.08.2(B1), 5.C.08.7, &amp; MACT.1(C)

This report is for indicated emissions from the fiberline, pulp washing systems, oxygen delignification, and screening/knotting systems exceeding 5 minutes duration, or permit condition exceptions.

Incident No.	Date	Start Time (am or pm)	HVLC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
There were no excursion events or downtime during the month of July 2015.						
There were no excursion events or downtime during the month of August 2015.						
1	9/23/15	12:42 PM	Power House	10	CB2 fell below min steam flow due to several bark screws down	unplugged bark screws to increase steam flow
1	10/15/15	2:49 PM	Power House	14	#1 CB Tripped out due to wet bark	Changed gas over to #2CB and reset
1	11/15/15	3:18 AM	Power House	318	Belts on HVLC fan broke	Repaired belts, returned fan to service
2	11/23/15	6:53 PM	Power House	29	Lost bark due to plugged chute; could not get enough fuel in to steam either boiler; 150# head pressure went low.	Returned bark and increased 150# header to normal, put LVHC sources back in.
3	11/30/15	2:58 AM	Power house	9	Steam injector pressure went low; unable to close vent valve.	Pressure returned; manually returned vent valve.
4	11/30/15	2:58 AM	Fiberline	21	Power loss caused shutdown of feed system.	Returned power
1	12/30/15	9:41 AM	Fiberline	55	Maintenance required at Powerhouse; needed to open vent valve	Completed maintenance and closed vent valve.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Scott Palmer

General Manager

Signature:

1/15/16





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ID 2605, ID 3705

SIP, NSPS

## CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

### Low Volume High Concentration Gas System

Report Period 7/1/15 to 12/31/15

4.C.08.1(B), 5.C.08.2(B1), 5.C.08.7, & MACT.1(C)

\* multiple effect evaporator systems exceeding 5 minutes duration, or permit condition exceptions.

Incident No.	Date	Start Time (am or pm)	LVHC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
1	7/22/15	8:22 PM	PH Main	12	CB2 gas burner tripped	gas burner restored
There were no excursion events or downtime during the month of August 2015.						
There were no excursion events or downtime during the month of September 2015.						
1	10/13/15	8:34 AM	PH Evap	8	Broken air line on vent valve	Called EI to get LVHC back in system
2	10/15/15	2:49 PM	PH (all)	32	#1 CB Tripped out due to wet bark	Changed gas over to #2CB and reset
3	10/18/15	7:27 AM	PH LVHC	6	Gas valve stuck in boiler	Fixed valve
4	10/19/15	8:17 AM	PH Feed tank	6	#2 CB burners tripped, lost bark flow, low steam	Increased bark and aux. burners
5	10/23/15	9:13 AM	PH Evap & LVHC	32	Ejector pressure switch giving a low reading, venting	Raised 150# header above normal and switch reset
6	10/24/15	2:49 PM	PH LVHC	11	Loss igniter flame	Reset
1	11/23/15	6:52 PM	PH LVHC (all)	46	Lost bark due to plugged chute; could not get enough fuel in to steam either boiler	Returned bark and increased 150# header to normal, put LVHC sources back in.
2	11/23/15	6:52 PM	Fiberline LVHC (all)	9	150# head pressure went low.	Returned bark and increased 150# header to normal, put LVHC sources back in.
3	11/23/15	9:39 PM	PH LVHC Feed Tank	8	CB2 main gas valve malfunctioned	Closed CB2 main gas valve
4	11/25/15	9:10 PM	PH LVHC Evap 2	6	Evap 2 collection LVHC collection valve would not close	Manually closed collection valve.
5	11/30/15	2:58 AM	PH LVHC (all)	44	Steam injector pressure went low; unable to close vent valve.	Pressure returned; manually returned vent valve.
6	11/30/15	2:58 AM	Fiberline LVHC (all)	29	Power loss caused shutdown of feed system.	Returned power
There were no excursion events or downtime during the month of December 2015.						

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Scott Palmer

General Manager

Signature:

1/15/16